

FILED

SEP 10 2021

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

CITY BARBEQUE LLC

Case Number: 1:21-cv-01016

Plaintiff,

ANSWER

vs.

OHIO CITY BBQ, INC.; NAVDIP  
SINGH;

CHRIS ABATSAS

Defendant

**NOW COMES** the Defendants Chris Abatsas and Navdip Singh **PRO SE** in  
answering the allegations of Plaintiff's Complaint denies and alleges as follows:

**RESPONSE**

Defendants denies the allegations set forth in paragraphs 1 through 6 of  
plaintiff's complaint.

Defendants do not dispute the facts set forth in paragraphs 7 and 8 of plaintiff's  
complaint.

Defendants do not dispute the facts set forth in paragraphs 9, 10 and 11 of  
plaintiff's complaint.

Defendants denies allegations set forth in paragraphs 12 and 13 of plaintiff's  
complaint.

1 Defendants does not dispute the facts set forth in paragraphs 14 and 15 of  
2 plaintiff's complaint.

3 Defendants lacks sufficient information to either affirm or deny the allegations set  
4 forth in paragraphs 16, 17, 18, 19, 20, 21, 22, and 23 of plaintiffs complaint. To the extent that  
5 defendant does posses sufficient information, defendants denies those allegations.  
6

7 Defendants denies allegations set forth in paragraph 24 and 25 of plaintiffs  
8 complaint.

9 Defendant lacks sufficient information to affirm or deny statements made in  
10 paragraphs 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37,38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48,  
11 and 49 of plaintiffs complaint.  
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13 Defendant affirms allegations made in paragraph 50 of plaintiffs complaint.

14 Defendants in order to not be repetitive in our answers state that there is no  
15 trademark infringement therefore paragraphs 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64,  
16 65, 66, 67 , 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79 and 80 are all Moot.  
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18 Defendants denies the allegations set forth in paragraphs 81 (eighty one) through  
19 paragraphs 228 (two hundred twenty eight) of plaintiffs complaint.  
20

21 Plaintiffs have unlimited financial resources and have purposely filed a large  
22 amount of allegations and statements knowing the cost of counsel would be extreme to be  
23 represented in federal court. After many attempts to seek counsel has failed due to the fact it  
24 would put Ohio City BBQ out of business. This is a classic David versus Goliath. We ask that  
25 this Honorable Court allow us to have a chance to defend ourselves and allow us some leeway  
26  
27  
28

1 due to the fact that we are not practicing attorneys. We feel that the harassment we have dealt  
2 with by City Barbeque could warrant us a counter suit for mental stress caused by these actions.

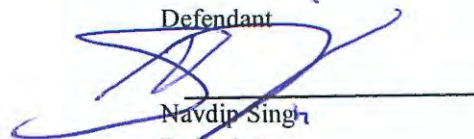
3 We do not seek any financial gain due to these actions:

4 WHEREFORE, Defendants requests that this court deny plaintiffs claims, enter judgement in  
5 favor of defendants, dismiss this suit with prejudice and award defendants its fees and costs,  
6 Reasonably incurred in connection with this matter. City Barbeque states that the trademark  
7 name is nationally registered we have enclosed Exhibit A and Exhibit B a list of just a few  
8 locations with name City BBQ why come after us and not these other establishments.  
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Respectfully Submitted this 10<sup>th</sup> Day of September 2021



Chris Abatsas  
Defendant



Navdip Singh  
Defendant

# **CERTIFICATE OF SERVICE**

**I hereby certify that I have served a copy of this Document**

**On 10<sup>th</sup> Day of September 2021 by United States Postal Service**

**Postage Prepaid To the Plaintiffs attorney at**

**250 West Street Suite 700, Columbus, Ohio 43215-7509**

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